EXHIBIT C

Page 1

1   UNITED STATES DISTRICT COURT

2   DISTRICT OF MINNESOTA

3

4   CASE NUMBER: 16-cv-1054 (WMW/DTS)

5   --

6   Fair Isaac Corporation, a Delaware corporation,

7   Plaintiff,

8   versus

9   Federal Insurance Company, and Indiana

     corporation, and ACE American Insurance Company, a

10   Pennsylvania corporation,

11   Defendants.

12

13

14   VIDEOTAPED DEPOSITION OF FEDERAL RULE OF CIVIL

15   PROCEDURE 30(b)(6) FEDERAL INSURANCE COMPANY and

16   ACE AMERICAN INSURANCE COMPANY WITNESS DESIGNEE

17

18   RAMESH PANDEY

19

20

21

22

23

24

25   TAKEN: 26 November 2019   BY: Jackie McKone

EXHIBIT C

Page 2

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24
25 Videographer: Dave Young, Paradigm/Veritext

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1   P R O C E E D I N G S
2   The following is the videotaped deposition
3 of Federal Rule of Civil Procedure 30(b)(6)
4 witness designee Ramesh Pandey, taken at Merchant
5 Gould, 150 South Fifth Street in Minneapolis,
6 Minnesota commencing at 9:26 a.m. on 5 June 2019
7 pursuant to notice.
8   * * *
9   (Whereupon material was marked for
10 identification as Exhibit 527.)
11   THE VIDEOGRAPHER: Good morning. We are
12 going on the record at 9:25 a.m. on November 26,
13 2019. Please note that the microphones are
14 sensitive. They pick up whispering, private
15 conversations, and cellular interference. Please
16 turn off cellphones and place them away from the
17 microphones as they can interfere with the
18 deposition audio. Audio and video recording will
19 continue to take place unless all parties agree to
20 go off the record.
21   This is Media Unit 1 of the video recorded
22 deposition of Ramesh Pandey, 30(b)(6) witness
23 taken by counsel for the plaintiffs in the matter
24 of Fair Isaac Corporation versus Federal Insurance
25 Company filed in the United States, District Court

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1 District of Minnesota, Case Number 16-CV-1054.
2 This deposition is being held at the law offices
3 of Merchant and Gould located in Minneapolis,
4 Minnesota.
5   My name is Dave Young. I am the
6 videographer. Our court reporter is Jackie
7 McKone. We are both representing Veritext Legal
8 Solutions. I'm not related to any party to this
9 action nor am I financially interested in the
10 outcome.
11   Counsel will now state their appearances
12 and affiliations for the record. If there are any
13 objections to this proceeding, please state them
14 at the time of your appearance beginning with the
15 noticing attorney.
16   MR. HINDERAKER: Allen Hinderaker from
17 Merchant and Gould on behalf of the plaintiff.
18   MS. JANUS: Leah Janus from Fredrikson and
19 Byron on behalf of defendants.
20   THE VIDEOGRAPHER: And will the court
21 reporter please swear in the witness, and then we
22 can proceed.
23   * * *
24   RAMESH PANDEY
25   after having been duly sworn deposes and says

2 (Pages 2 - 5)

Page 6

1   under oath as follows.
2   * * *
3   EXAMINATION
4   BY MR. HINDERAKER:
5 Q. Good morning. We met, we commented in the hallway
6   about our -- the frequency of our interactions
7   here in --
8 A. Many times.
9 Q. So I know that we've done, you know, you and I
10   have -- you have sat for examination now this will
11   be the third time in this lawsuit, and did you
12   meet with counsel to prepare for the deposition
13   today?
14 A. Yup.
15 Q. It would be helpful I think sir if when you're
16   answering try to speak up a bit.
17 A. Yes.
18 Q. And of course, having a verbal answer rather than
19   a nod or a gesture. So how long did you -- how
20   long did you prepare for today's deposition?
21 A. Yesterday and today also. So two days.
22 Q. How many hours would you say?
23 A. Few hours yesterday, was a good long day. I came
24   early so it was a long time.
25 Q. I'm sorry. What?

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1 A. Yesterday almost all day.
2 Q. I have to get my ear tuned to you. Well, I'm not
3   going to go through all of the things that we've
4   done in the past but only to -- only to say if I
5   ask a question that isn't clear to you or you do
6   not understand --
7 A. Okay.
8 Q. -- please let me know.
9 A. Sure.
10 Q. Okay. I recall -- well, rather than me recall,
11   your job title is what please?
12 A. Now I'm the head of the integration architect and
13   ICC delivery center.
14 Q. So I understood integration architect?
15 A. Integration delivery centers -- integration center
16   of competency. I lead that group.
17 Q. When did you assume that role?
18 A. About five months back. So I was the chief
19   architect for North America. Now I took the ICC
20   delivery also.
21   MS. JANUS: One moment. Did something
22   happen so that someone called in? We have a live
23   video --
24   THE VIDEOGRAPHER: We're going off the
25   record. The time is 9:30.   0

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1   (Whereupon a short break was taken from
2   9:30 a.m. to 9:33 a.m.)   0
3   THE VIDEOGRAPHER: We are back on the
4   record. The time now is 9:32 a.m.
5   BY MR. HINDERAKER:
6 Q. So about five months ago, you had a new role
7   integration architect, ICC?
8 A. Yes.
9 Q. And previous to that, you were?
10 A. Chief architect for North America.
11 Q. For how long did you have that role?
12 A. Four years.
13 Q. So beginning in about 1915 -- 2015?
14 A. Yes.
15 Q. Then before being chief architect of North
16   America, what role was your role?
17 A. Chief architect for Chubb, the original Chubb,
18   Legacy Chubb.
19 Q. What was the -- when you were chief architect for
20   Legacy Chubb, what was the geographic scope of
21   that responsibility?
22 A. North America. Mainly US, Canada. US and Canada.
23 Q. Okay. So all right, and for how long did you have
24   that role?
25 A. Less than two years.

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1 Q. Have you -- going to the current time, integration
2   architect, what's the geographic scope of that
3   responsibility?
4 A. That's the North America mainly from architecture
5   point of view, but the ICC delivery is global.
6 Q. Then before chief architect for Legacy Chubb, you
7   were --
8 A. I was with Citibank.
9 Q. This has been marked as Exhibit 527, and when was
10   first time you saw this?
11 A. Couple of weeks back, few weeks back.
12 Q. Did you have any role in the preparation of
13   Exhibit 527?
14 A. Yes.
15 Q. What was it?
16 A. So I collected all the -- I reached out to all the
17   team leads, architects, and different team members
18   to find the information so that I can put the
19   dates and version for the delete, the records, and
20   also which data center they were deployed and
21   everything. So all of it associated with this I
22   did it.
23 Q. So let me just -- let me back up. So what I heard
24   you say is you reached out to the persons in the
25   different locations who had responsibility.

3 (Pages 6 - 9)

Page 10

1 A. Yes.
2 Q. Okay. Did you yourself gather any of the
3   underlying documents that had the responsive
4   information?
5 A. Yes. Working with those teams, let's say for
6   Europe, working with Mike Hutchinson and his team,
7   working with Canada, that team. So yes. I --
8   they were gathering, but I was talking to all of
9   them. Mostly.
10 Q. So let me just go country by country and
11   understand the liaisons that you worked with. So
12   Canada; with whom did you work?
13 A. Silverio Miranda, he's the chief architect for
14   Canada. Zorica --
15 Q. I can't go that fast. Can you spell the person's
16   name for Canada?
17 A. Silverio, S-I-L-V-E-R-I-O.
18 Q. The last name?
19 A. Miranda, M-I-R-A-N-D-A.
20 Q. All right. Thank you. Then who else in Canada?
21 A. Zorica, Z for zebra, O-R-I-C-A, last name
22   Todorovic.
23 Q. That would be T-O-D-O-R-O-V-I-C?
24 A. Exactly.
25 Q. That one I have.

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1 A. Yup.
2 Q. Anyone else?
3 A. Also I talked to Shailesh Sharma, and a lot of
4   people. These are the teammates.
5 Q. Would you spell the third person please?
6 A. Shailesh, S-H-A-I-L-E-S-H S-H-A-R-M-A.
7 Q. That's the last name?
8 A. Yes.
9 Q. Say that again?
10 A. S-H-A-R-M-A.
11 Q. So were they the main people for Canada?
12 A. Exactly.
13 Q. All right, and then for the UK, for Europe?
14 A. It's Mike, Michael Hutchinson.
15 Q. Before I ask the next person, do you make a
16   distinction between the UK and Europe, or is that
17   the same --
18 A. They are same thing for us. It's Europe joined
19   EUD. It's the same thing.
20 Q. So you spoke with -- spoke with Mike Hutchinson,
21   and who else?
22 A. And Claudio.
23 Q. Okay. Claudio is located in the US?
24 A. UK.
25 Q. Claudio -- what's Claudio's last name?

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1 A. Gislanjani (phonetic).
2 Q. I thought he was a US guy.
3 A. He's responsible for US and UK both, but he lives
4   in the UK, but he's responsible for US.
5 Q. So Mike Hutchinson, Claudio. Anybody else that
6   was primarily --
7 A. These are the two main.
8 Q. All right, and then Australia?
9 A. Same; Mike Hutchinson and Claudio.
10 Q. All right. So I --
11 A. For Australia also Zorica, Zorica Todorovic. She
12   also gives information.
13 Q. Zorica? Zorica?
14 A. Yes.
15 Q. She's a Canadian person as well?
16 A. Yes, Canadian, and she also informs about
17   Australia.
18 Q. Then anyone else that were the principal people?
19 A. That's it.
20 Q. So let me run through a series of names that came
21   to me with respect to this deposition, and let me
22   know if you've talked to them?
23 A. Okay.
24 Q. Tony Zhang?
25 A. He's under Silverio. So Silverio must have talked

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1   to him.
2 Q. You don't know that one way or the other?
3 A. Well, Silverio talked to his team. He's part of
4   that team.
5 Q. I'm just asking whether you spoke with him.
6 A. No. Not directly. Through Silverio.
7 Q. Henry Mirolyuz?
8 A. No. He doesn't work for us anymore.
9 Q. Cristian Vasilache?
10 A. No.
11 Q. Alexander Pavlenko?
12 A. Pavelko. Yes. That's Silverio and Alex. Yes.
13   Alex report to --
14 Q. So they are Canadians, and they would be reporting
15   to Silverio?
16 A. Exactly.
17 Q. But you did not speak to them --
18 A. No. I talked to Alex, but I heard -- Silverio
19   collected all the data for me.
20 Q. So you did speak with Alex?
21 A. Yeah, but I told her just help Silverio out.
22 Q. Lance Martin?
23 A. Lance is -- I didn't talk to him. No.
24 Q. Richard Johnson?
25 A. No.

4 (Pages 10 - 13)

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1 Q. Agnes (sic) Mochrie?
2 A. Oh. These guys are under Mike Hutchinson. Now I
3   know who you are -- Mike talked to all of them.
4 Q. But you did not?
5 A. No. I told them to talk to these guys, all these
6   teams, and he told me that he talked to all of
7   them personally.
8 Q. I'm just asking whether you did.
9 A. I didn't, but Mike told me that he talked to all
10   of these.
11 Q. Russell Hodey?
12 A. Russ Hodey Mike talked to him.
13 Q. Did you?
14 A. No. I told Mike, Mike told me that he talked to
15   him.
16 Q. Dean Lawton?
17 A. Who?
18 Q. Dean Lawton?
19 A. It must have been Mike's guy.
20 Q. You did not speak to him?
21 A. No I didn't. I didn't know about him.
22 Q. James Quittenton?
23 A. I think it's Mike Hutchinson's guy.
24 Q. You did not speak with him?
25 A. No, but Mike talked to all of these.

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1 Q. Stuart Fisher?
2 A. Stuart Fisher Mike talked to him.
3 Q. Did you?
4 A. I didn't. Because of timing difference, Mike
5   talked to him.
6 Q. Understood, and Ewen Setti?
7 A. I didn't, that name.
8 Q. David Gibbs?
9 A. Mike's guy.
10 Q. Did you speak with him?
11 A. No. Mike had communication with him.
12 Q. Christopher Spinden?
13 A. Chris Spinden he doesn't work for us anymore.
14 Q. So you did not speak with him?
15 A. No. He's not part of Chubb anymore.
16 Q. So you did not speak with him?
17 A. No.
18 Q. Craig Thomson?
19 A. Craig Thomson. I think Mike talked to him.
20 Q. Did you?
21 A. No I didn't, but I asked Mike to talk to his team.
22 Q. Hamish Tonkin?
23 A. No. He doesn't work for Chubb anymore.
24 Q. So you didn't speak with him?
25 A. No. He's not part of Chubb.

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1 Q. Okay. Did you receive from your work in preparing
2   for this -- I'm sorry. Did you receive for your
3   work in preparing Exhibit 527 documents that
4   memorialize or confirm the information on it,
5   excuse me, on Exhibit 527?
6 A. No. I had, like, a multiple hour talk with Mike,
7   Zorica, and everybody, and I collected -- I asked
8   all these questions multiple times, and I asked
9   the same question you're asking; whom did you
10   talk, did you talk to this person, this team, this
11   team, this team, they confirmed this, and based
12   upon that, I created this mail, and after these
13   are the dates, the version to see how -- when it
14   applied. There was a lot of clues when we were
15   meeting and conference if you call it.
16 Q. A lot of what kind of --
17 A. Meetings and conferences for these multiple times.
18 Q. Did you yourself see or have in your possession
19   documents that confirm this information?
20 A. I have seen it, but Mike talked to all the people.
21   I talked to all the people, discussed with them
22   based upon the best knowledge they had,
23   information they had. The other dates we come up
24   with.
25 Q. I'm just wondering whether you had in your

Page 17

1   possession the documentation that relates to this
2   information.
3 A. No. Not the document that I have. No.
4 Q. So all of the documentation was with the
5   individuals that you were speaking with?
6 A. Yes. Me, Mike, Zorica, Silverio.
7 Q. Understood. Did you -- in preparing for the
8   deposition today, did you review any -- any
9   documents?
10 A. Document related to?
11 Q. Related to the subject matter of these
12   installations?
13 A. Oh. We -- I did about Adept -- Adopt and Adept,
14   those applications, what do they do, who used it,
15   who acquired it. So I collected a lot of
16   information so that I can talk about what
17   technology they used, what functionality they
18   used, who was using it. So all the stuff, yes, I
19   did a lot of reading of the documentation.
20 Q. In preparation for the deposition today?
21 A. Exactly. Yup.
22 Q. I'd like to -- so I'm clear, I want to try to make
23   a distinction between information that you know
24   yourself and information that you learned through
25   this effort by the various conferences and

5 (Pages 14 - 17)

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1   discussions with the people you identified.
2 A. Yup.
3 Q. Okay. With respect to the information on Exhibit
4   527, is any of this information -- do you know any
5   of this information from your own personal
6   knowledge?
7 A. Yes. The data center is first. So this last
8   column that you see that I have firsthand
9   information. Versions, like 6.7, 7.1, I have
10   firsthand knowledge. Exact date, I knew the years
11   but the date whether it's Number 6, or Number 5,
12   or Number 8, that was the discussion with talking
13   to bunch of people and zeroing. So like I said,
14   last column, first column. Middle column that's
15   where we had to -- dates, and you asked for very
16   specific dates.
17 Q. Um-hm. Because then -- my understanding being
18   that your geographic scope of responsibilities has
19   been North America.
20 A. Which is US and Canada.
21 Q. Which US and Canada.
22 A. Yes.
23 Q. My question is: How did you have firsthand
24   knowledge of the installations and the data center
25   in UK or Europe?

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1 A. So Europe, this is in Legacy Chubb before merger,
2   most of the systems were deployed in North America
3   data center, which is Raleigh, North Carolina.
4   Even if they were used by, let's say, London, or
5   Australia, anybody, the systems were deployed in
6   Raleigh. So that's why I know those systems.
7 Q. So I understand why you know the systems in
8   Raleigh. My question is: How would you know what
9   was happening in the data center in the UK during
10   your time as North American chief architect?
11 A. So let's take the application. If you --
12   MS. JANUS: I'm confused by this
13 questioning. He's just talked about all the
14 things he did to prepare for today. So what are
15 you asking him about now?
16   MR. HINDERAKER: I'm asking about what
17 information is his own firsthand knowledge.
18   MS. JANUS: Yes. He gave you that. He
19 answered your question about that.
20   MR. HINDERAKER: Thank you for your
21 commentary.
22   MS. JANUS: I just -- I'm not --
23 BY MR. HINDERAKER:
24 Q. I want to know during your time as chief architect
25   of North America, did you have -- how would you

Page 20

1   know separate from -- my questions are separate
2   from the -- separate from the conferences and the
3   discussions that you had to prepare the
4   information on Exhibit 527.
5   My question is: How or whether, you know,
6   you knew this information of your own knowledge
7   while you were chief architect of North America.
8   MS. JANUS: Asked and answered. It's
9 outside the scope of the topics. Let's get back
10 scope of the topics. Do you understand the
11 question?
12   THE WITNESS: Yes I do.
13 BY MR. HINDERAKER:
14 Q. Please answer it.
15   MS. JANUS: So the question is: What did
16 you know based on your own firsthand knowledge?
17   THE WITNESS: For the -- you're talking
18 about Europe?
19 BY MR. HINDERAKER:
20 Q. I was. Yes.
21 A. Okay. So Europe -- if you have a system which is
22   deployed in North America, but if somebody wants
23   to use it in, let's say, the UK, they would ask us
24   for help. Let's say that I have a -- you use,
25   like -- we use Blaze software, can you recommend,

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1   well, like, who could help to deploy in London.
2   So we give the name of Blaze person --
3 Q. Give the what?
4 A. Fair Isaac person name, and say ask these guys,
5   they will send a couple of people to help you out,
6   install it or train you. That's what we did.
7   When they reached out to us, we told Mike
8   Swoyer from Fair Isaac at that time we call Blaze,
9   and Blaze send a couple of people to help European
10   team to deploy -- like, configure it and make it
11   work. They send couple of people to help them
12   out.
13 Q. Did you have that conversation with Mike Swoyer?
14 A. That's my team.
15 Q. No. I didn't ask your team. I said: Did you?
16 A. I knew that they were going. I didn't approve
17   this. My boss approved it at that time, but yes,
18   I was part of the discussion.
19 Q. Did you have the conversation with Mike Swoyer?
20 A. Not me, but my team.
21 Q. Understood.
22 A. The guy who reported to me did.
23 Q. Who reported to you?
24 A. Henry Mirolyuz, and I reported to Patrick Ceylon
25   who signed this.

6 (Pages 18 - 21)

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1   (Whereupon material was marked for
2   identification as Exhibit 528.)
3   BY MR. HINDERAKER:
4 Q.   Showing you Exhibit 528, which is the Rule
5   30(b)(6) deposition notice for today, and you've
6   seen this before have you, or have you seen this
7   before?
8 A.   Yes.
9 Q.   And you're here of course to testify to the three
10   topics of the deposition notice?
11 A.   Yes.
12 Q.   Okay. Oh. This already has been marked as an
13   exhibit. So this is Exhibit 8 from another
14   deposition Mr. Ramesh, and take a moment to
15   familiarize yourself with it if you'd like, and I
16   just have a couple of questions.
17 A.   Okay.
18 Q.   All right. I don't see that you are involved in
19   this e-mail. Do you agree?
20 A.   Not on this one.
21 Q.   Okay. Did you review this document in preparing
22   for the deposition today?
23 A.   Which document?
24 Q.   The one in your hand, Exhibit 8?
25 A.   This one, yes.

Page 23

1 Q.   Did you review this document to prepare for the
2   deposition?
3 A.   Yes.
4 Q.   Mr. Zhang; his -- he was a Canadian representative
5   of Chubb?
6 A.   He worked for Canada team.
7 Q.   Mr. Mirolyuz reported to you of course in the US?
8 A.   Yes.
9 Q.   If you reviewed this Exhibit 8 to prepare for
10   disclosure of 527, do you understand what I'm
11   saying?
12 A.   This one; right?
13 Q.   Yes. Exhibit 8 is -- the subject matter of
14   Exhibit 8 is the installation of Blaze Advisor in
15   Canada?
16 A.   No. It's not -- it's saying that it's file server
17   sitting in North Carolina, Raleigh, S-R-E-F-S,
18   system files server 1. That's the drive. He's
19   saying that's what we copied using the cbwiki with
20   the Chubb wiki link, which is in Raleigh, North
21   Carolina. He's saying this is what we copied, and
22   if you want, you can deploy a development server
23   sitting Raleigh, North Carolina. So looking at
24   naming, I can see the Raleigh service.
25 Q.   You're reading this -- you're reading from part of

Page 24

1   the first page of Exhibit 8 that says, "Hi Tony, I
2   copied Blaze."
3 A.   Yes. In our CR drive sitting in Raleigh, North
4   Carolina on this date.
5 Q.   So the SREF --
6 A.   File server.
7 Q.   -- S01 that's a server in Raleigh, North Carolina?
8 A.   Yes. It's the file server 01 public BR COE. This
9   naming was found in Raleigh.
10 Q.   Understood. So on that -- on that part of the
11   e-mail, Henry is telling Tony that he copied Blaze
12   Advisor file to that server?
13 A.   Yeah. That's, like, a Raleigh server to Raleigh
14   server. A CR drive. That's what it is.
15 Q.   Then Henry is telling Tony where Henry -- where
16   Tony can find installation instructions?
17 A.   Yeah. This is a wiki link and the file server is
18   in Raleigh. Chubb in Raleigh.
19 Q.   Then Tony Zhang on the top of the e-mail says,
20   "Henry, thanks Henry. I was able to install it."
21 A.   In development center in Raleigh. Yes.
22 Q.   Okay. Now, it doesn't say that. How do you --
23   why do you think it's in Raleigh?
24 A.   Because if he copied -- he used the wiki in
25   Raleigh, serve drive in Raleigh, install Raleigh

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1   because Canada, all the servers for Canada were
2   sitting in Raleigh.
3 Q.   What about the servers in Toronto?
4 A.   Which server are you talking about?
5   (The reporter asked for repetition.)
6   THE WITNESS: Which server are you talking
7   about?
8   BY MR. HINDERAKER:
9 Q.   I'm talking about the servers in Toronto that had
10   Blaze Advisor that --
11 A.   No. Toronto didn't have the servers where you can
12   install this. Toronto -- remember, you're talking
13   about 2010. In 2010, it was Legacy Chubb. Legacy
14   Chubb the only servers were in Raleigh, North
15   Carolina, and Canada was supposed to only use the
16   server. You see the naming convention here, you
17   see the wiki link here, whole thing in Raleigh,
18   North Carolina. Nothing Toronto here. The guy
19   was sitting Toronto. I agree.
20   MR. HINDERAKER: Would mark this as the
21   next one.
22   (Whereupon the material was marked for
23   identification as Exhibit 529.)
24   THE WITNESS: Okay.
25   BY MR. HINDERAKER:

7 (Pages 22 - 25)

Page 26

1 Q. Okay. Did you review this exhibit, this e-mail
2   which we're now calling Exhibit 529 to prepare for
3   the deposition today?
4 A. I have seen it.
5 Q. Okay. Did you review Exhibit 529 to prepare for
6   the deposition today?
7 A. I reviewed it, but I don't remember did I review
8   yesterday. I don't remember, but I reviewed this
9   one.
10 Q. Okay, and tell me who Lance Martin is.
11 A. Lance was my project monitor for governance in --
12 Q. What?
13 A. Governance. It's a review of applications. He
14   reported to me in Legacy Chubb.
15 Q. And we've identified Zorica Todorovic?
16 A. Yes.
17 Q. He's part of Chubb Canada?
18 A. That's correct.
19 Q. And the subject matter of Exhibit 529 is CAZ
20   ChEAR?
21 A. Yes.
22 Q. Contact replace, and then the attachment is CAZ
23   applications?
24 A. Yup.
25 Q. And CAZ is an acronym for Canada zone?

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1 A. Yes.
2 Q. And ChEAR is a form of report that Chubb, Legacy
3   Chubb used?
4 A. ChEAR means Chubb Enterprise Architecture
5   Repository.
6 Q. What was the last word?
7 A. Chubb Enterprise Architecture Repository.
8 Q. Repository?
9 A. Yes. That was in Raleigh, North Carolina.
10 Q. Then if you look at the attachment please to the
11   e-mail.
12 A. Which page?
13 Q. I want you to look at Line 8 -- well, I suppose
14   you have to look at the first page that has the
15   column headings so that you see under Column L it
16   says Data Center Location. Do you see where I'm
17   saying?
18 A. Okay.
19 Q. Okay, and then if you go to Line 8, Column L, this
20   document says Toronto; right?
21 A. That's a logical name. So --
22 Q. Pardon me?
23 A. Can I explain it.
24 Q. You said something, but I didn't understand that's
25   why I said pardon me. This is a? I asked you

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1   this document says the data center is Toronto, and
2   you said?
3 A. Yes. I see Toronto.
4   MR. HINDERAKER: Would go ahead and mark
5   this please.
6   (Whereupon the material was marked for
7   identification as Exhibit 530.)
8   BY MR. HINDERAKER:
9 Q. And Mr. Ramesh, I've given you Exhibit 530. This
10   is an e-mail and attachments. I'd just like to go
11   through the people on the e-mail first if you'd
12   like.
13 A. Sure.
14 Q. So Cristian Vasilache; who is that individual?
15   MS. JANUS: Do you need a moment to review
16   the document?
17   THE WITNESS: I do a little. Yes.
18   BY MR. HINDERAKER:
19 Q. Let me know when I can ask you questions.
20 A. Okay. Go ahead.
21 Q. Give me a second. My first question is: Can you
22   identify Cristian Vasilache, the individual from
23   whom the e-mail is from?
24 A. I don't know the name but -- I don't know who it
25   is. I don't know the name.

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1 Q. Okay, and the e-mail is to Alexander Pavlenko?
2 A. Yes.
3 Q. And he is a Canadian Chubb Canada person?
4 A. Yup.
5 Q. And again, the attachment is the CAZ ChEAR report?
6 A. Um-hm.
7 Q. And when you reviewed the document, did you see if
8   you were in this communication chain at all?
9 A. I didn't see my name, but ...
10 Q. Okay. Thank you. Then if we go to the
11   attachment, and the ChEAR report, and Line 8.
12 A. Yup.
13 Q. Under Column N, data center location?
14 A. Um-hm.
15 Q. This document shows the data center location for
16   Evolution Canada as Toronto; correct?
17 A. And also read the Column E. As I said, the Blaze
18   form will be used in future. Will be. Not is
19   used.
20   So what they are saying the Blaze will be
21   developed, will be used, will be deployed in the
22   future in Canada. That's their thought. They are
23   saying that I'm prepare for the form that will be
24   used for Canada in the future.
25   When it comes to process, we say no, it

8 (Pages 26 - 29)

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1 will be used by Canada, deployed in North
2 Carolina, you don't have anything else about it,
3 will be thinking those. No. Anyway, you see will
4 be, will be, will be, will be, will be, will be.
5 Q. Understood. You made the distinction between
6   development and deployment?
7 A. Yes.
8 Q. And I'd like you to explain first what development
9   is.
10 A. So development is -- development --
11   MS. JANUS: Wait a second. What does that
12 have to do with the items for this 30(b)(6)
13 deposition now?
14   MR. HINDERAKER: It has to do with his
15 explanation of this document that has a data
16 center in Toronto.
17   MS. JANUS: Does that question relate to
18 installation?
19   THE WITNESS: If he's talking about
20 development and development box where would the
21 development box sitting, then it could a
22 development box server. When I say box
23 development server, only in Raleigh, North
24 Carolina.
25   BY MR. HINDERAKER:

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1 Q. I understood you to say, or tell me this is in --
2   your testimony is that the Evolution application
3   when deployed was hosted in Raleigh, North
4   Carolina; is that your understanding, or not?
5 A. Yes. It was developed in North Carolina, and with
6   my understanding, it would deploy in Raleigh,
7   North Carolina itself, and the document you see
8   here it's a futuristic.
9 Q. And now, in your earlier answer to my question,
10   you made the distinction between development and
11   deployment, and I'd like you to tell us what
12   development means.
13   MS. JANUS: Why? What does -- objection.
14 I don't understand how that relates to the scope
15 of this deposition. This deposition is very
16 narrow in scope.
17   MR. HINDERAKER: Yes. I know that.
18   MS. JANUS: So what does the distinction
19 between development and deployment have to do with
20 all installations of all versions of FICO software
21 at issue in this lawsuit where the installation
22 occurred outside of the United States, the
23 location of the installation, or the date of the
24 installation? That is what we are here to answer.
25   MR. HINDERAKER: You can instruct him not

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1 to answer, or you can listen to his answer.
2   MS. JANUS: Will you explain to me how that
3 question and the answer you're seeking relates to
4 the topics that you've noticed in this deposition
5 pursuant to a court order?
6   MR. HINDERAKER: Because Mr. Ramesh made a
7 distinction between deployment, and he's told me
8 that the products was the Blaze Advisor -- sorry.
9 He told me that the application of Evolution was
10 deployed from the installing in Raleigh, North
11 Carolina, and with this document saying Toronto,
12 he also made a distinction between deployment and
13 development. I'd like to understand what
14 development means. Because perhaps the software
15 is installed in Toronto.
16   MS. JANUS: That I believe is a fair
17 question now. I believe that is a fair question.
18   MR. HINDERAKER: That's the question I
19 asked him --
20   MS. JANUS: No --
21   MR. HINDERAKER: -- what is development.
22   MS. JANUS: No. You didn't ask him was the
23 software installed in Toronto for development.
24 You didn't ask that question. This is --
25   MR. HINDERAKER: You can instruct him --

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1 I'm going to ask my question. You can instruct
2 him not to answer --
3   MS. JANUS: Please don't raise your voice
4 with me --
5   MR. HINDERAKER: I'm not trying to.
6   MS. JANUS: This is a professional meeting.
7 It's not going to work to raise your voice. This
8 is a narrow deposition. We've already been here
9 for almost 45 minutes. So ...
10   MR. HINDERAKER: And we have seven --
11   MS. JANUS: -- how -- I understand the
12 explanation to relate to a question about
13 installation.
14   BY MR. HINDERAKER:
15 Q. Mr. Ramesh, can you tell us what the distinction
16   is between development and deployment?
17   MS. JANUS: Same objections. Do you
18 understand how that question relates to
19 installation?
20   THE WITNESS: You're talking about who
21 installed it? I'm trying to understand your
22 question. What development and deployment. What
23 development -- are you talking about who installs
24 development and who installs application? Can you
25 explain more?

9 (Pages 30 - 33)

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1   BY MR. HINDERAKER:
2   Q.   I'm trying to understand the distinction myself.
3   For example, I understand that, I think but you
4   have to tell me, that Blaze Advisor can be
5   installed on a laptop for development purposes,
6   but that would not be -- but Blaze Advisor
7   installed on a laptop for development purposes
8   could not be used for deployment; is that fair?
9   A.   No. We don't allow software like Blaze to be
10   installed on the laptop. That's not a Chubb
11   practice.
12   Q.   Okay.
13   A.   So you can --
14   Q.   Can I ask another question then?
15   A.   Yup.
16   Q.   When Blaze Advisor -- when the application that
17   uses Blaze Advisor is being developed, and I'd
18   still like to know what your meaning of developed
19   is.
20   A.   So let's say in Raleigh you have two servers; one
21   where you can make the changes every day, and
22   then --
23   Q.   Where you can what sir?
24   A.   Where you make the changes every day, every week.
25   Other one where we put in the next to that the

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1   server and say nobody makes change except go live
2   dates. So this is where everybody uses. This one
3   they are possible making changes. Okay? So they
4   might be sitting next to each other. One is
5   developer to make changes, make sure it works,
6   take the code, apply to next server, this server
7   everybody uses it. It's Raleigh to Raleigh.
8   Q.   So Blaze Advisor -- an application using Blaze
9   Advisor can't be developed from the software
10   hosted on a server?
11   A.   That's the recommendation. That's the only way.
12   We don't allow to install. We don't allow.
13   Q.   You and I have been using the word developed, and
14   rather than me assuming I know what I -- I know
15   what I understand, but what do you -- what is
16   developing an application?
17   MS. JANUS: Objection. Outside the scope.
18   How does that relate to the topics that you've
19   noticed in this deposition?
20   MR. HINDERAKER: I'm -- hopefully to having
21   a clear deposition, that I'm not being --
22   misunderstanding his testimony.
23   MS. JANUS: No.
24   BY MR. HINDERAKER:
25   Q.   Can you answer my question please? What is

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1   developed -- what does it mean to develop as
2   opposed to --
3   MS. JANUS: I'm instructing him not to
4   answer that as outside the scope of the
5   deposition.
6   MR. HINDERAKER: Okay. That's your
7   position.
8   Will you mark this please.
9   (Whereupon the material was marked for
10   identification as Exhibit 531.)
11   BY MR. HINDERAKER:
12   Q.   Mr. Pandey, Exhibit 531 is an -- some pages of
13   your deposition that was taken November 13, 2018.
14   A.   Okay.
15   Q.   And my inquiry is on Page 156, which is in the
16   upper right corner here, and if you start at Line
17   14, you testified that -- my question is, "Is
18   Toronto still the data center for Blaze Advisor?"
19   On Line 12, and on Line 14, you testified, "I
20   don't think so. With Toronto what happened
21   actually we are consolidating the data centers.
22   We had 48 data centers before Raleigh was one of
23   them. Canada was another one." My question
24   before then if I can interrupt, answer before the
25   merger, okay, and then you say in answer, "After

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1   that we made -- that we need only eight data
2   centers, and Canada was not one of them so we are
3   migrating everything to Raleigh."
4   A.   Okay.
5   Q.   And migrating means moving from the Canada data
6   center to the Raleigh data center; correct?
7   A.   Um-hm. Yup.
8   Q.   So from this testimony, my understanding -- your
9   testimony that Blaze Advisor was migrated from the
10   Toronto data center to the Raleigh data center?
11   A.   No.
12   MS. JANUS: Object to the form of the
13   question.
14   BY MR. HINDERAKER:
15   Q.   Why do you say no?
16   A.   Okay. You asked the question so I'll explain it
17   to you.
18   Q.   You said no so I asked you why do you say no?
19   A.   I forgot the question.
20   Q.   Oh. The question was: For something to be
21   migrated, it has to be -- you're migrating from
22   Canada to Raleigh. First it has to be in Canada
23   before it can move to Raleigh for there to be a
24   migration.
25   A.   Yup.

10 (Pages 34 - 37)

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1 Q. And so --
2 A. Can I explain to you?
3 Q. Yes. Please.
4 A. You see here 48 data centers?
5 Q. Yes.
6 A. Only 24 countries. How can you have 48 data
7   centers?
8 Q. I don't know. That's your testimony.
9 A. Let me explain please.
10 Q. Please.
11 A. Legacy 8 was in 56 countries. That's why they had
12   48 Legacy centers in Legacy Chubb. So after
13   merger, we say, okay, let's have 8 data center not
14   48 data center. So this is after merger taking
15   the Legacy 8 data center from Canada and moving
16   into Raleigh.
17 Q. And the question on Line 12 was, "Is Toronto still
18   a data center for Blaze Advisor?"
19 A. Toronto was never a data center for Blaze Advisor.
20   We had a data center in Legacy 8 in that now we
21   are migrating into Raleigh.
22   MS. JANUS: Is this a good time for a
23   break?
24   MR. HINDERAKER: Sure.
25   THE VIDEOGRAPHER: Going off the record.

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1   The time now is 10:22.
2   (Whereupon a short break was taken from
3   10:23 a.m. to 10:30 a.m.)
4   THE VIDEOGRAPHER: We are back on the
5   record. This is the start of Media Number 2. The
6   time is 10:30.
7   BY MR. HINDERAKER:
8 Q. This is Exhibit 3 from an earlier deposition, and
9   when you've had a chance to look at it or
10   familiarize yourself, let me know.
11 A. Okay.
12 Q. Okay, and you've told us that you did not have
13   occasion to talk to Mr. Mirolyuz, Mr. Johnson or
14   Agnes (sic) Mochrie before -- in preparation for
15   today's deposition.
16   When you reviewed the deposition -- when
17   you reviewed the exhibit, did you see yourself as
18   part of communication at all?
19 A. No. I don't see it.
20 Q. Okay, and Mr. Johnson, do you know where he was
21   located in Chubb in May of 2009?
22 A. I don't know. I don't know.
23 Q. Did you review this Exhibit 3 in preparing for
24   your deposition today?
25 A. Yes I did.

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1 Q. And do we agree that -- well, that's okay. We can
2   go through the exhibit. Slightly different
3   question from what I asked before.
4   Sir, were you personally involved in -- in
5   this subject matter of Exhibit 3, being --
6   providing download instructions and installation
7   instructions to Mr. Johnson in May of 2009?
8 A. No. Not personally.
9   (Whereupon material was marked for
10   identification as Exhibit 532.)
11   BY MR. HINDERAKER:
12 Q. You've been handed Exhibit 532, and let me know
13   when you've had a chance to familiarize yourself
14   with it.
15 A. Okay.
16 Q. Do you recognize the individuals on the e-mail as
17   various people within the Chubb organization,
18   Chubb Europe or Chubb USA?
19 A. Chubb Europe. Yes.
20 Q. Chubb Europe. Okay, and obviously the exhibit is
21   dated November 6, 2009. Mr. Stuart is telling Mr.
22   Thomson, "We've got it deployed alongside within
23   our application. It's the lightweight," -- "It's
24   the lightweight version, and it's version 6.7."
25 A. Um-hm.

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1 Q. Is it fair to say this is about Blaze Advisor;
2   correct?
3 A. I guess.
4 Q. The subject line is What Version is Being Used for
5   Blaze Advisor.
6 A. Okay.
7 Q. On Exhibit 528, the disclosure, I appreciate it's
8   the approximate date of installation for version
9   6.7 you have as November 6, 2009?
10 A. Exactly.
11 Q. And Exhibit 532 that you just have in front of you
12   is November 6, 2009?
13 A. Yup.
14 Q. Okay, and Exhibit 532 is reporting that "I hope
15   we've got it deployed," and if there's not an
16   answer to this question, then don't guess, but if
17   Blaze Advisor is deployed at the UK data center on
18   November 6, 2009, how much before that time would
19   it have been installed?
20 A. I think mostly the same night I guess with this
21   one. Previous night maybe.
22 Q. Can you deploy an application using Blaze Advisor
23   if you install Blaze Advisor the night before?
24 A. Yeah. Yeah.
25 Q. You deploy it in an application?

11 (Pages 38 - 41)

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1 A. Yeah.
2 Q. What is -- isn't there a period of time -- I guess
3   I assumed there would be a period of time for
4   development of application.
5 A. No. No. No. Deployed means deployed.
6   Everything.
7 Q. Deployed means everything?
8 A. Yeah.
9 Q. Before -- before an application is deployed, does
10   it have to be developed?
11 A. Depends what deploy means.
12 Q. I know you're not the author of this so --
13 A. Yeah. I'm guessing. When I said deployed means
14   deployed, application, they deployed it.
15 Q. Could you explain what you just said?
16 A. So application along with Blaze they deployed it
17   in the UK data center. That's what it says.
18 Q. Do you have an understanding what deployed to mean
19   on Exhibit 532?
20 A. That's what I mean. It means deployed. Now you
21   can develop the products, and you can start using
22   it.
23 Q. So after it's deployed, then you can develop the
24   application?
25 A. Yes.

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1 Q. Yes?
2 A. That's what my understanding is. Yes. Unless
3   application they are --
4 Q. Pardon me?
5 A. Yes. That's what my understanding is.
6 Q. Okay. This is Exhibit 13 from an earlier
7   deposition, and let me know when you've had a
8   chance to review it. I just have a couple of
9   questions.
10 A. Okay.
11 Q. Okay. So Exhibit 13 is about the EZER
12   application?
13 A. Um-hm.
14 Q. Yes?
15 A. Yes.
16 Q. And then if you go to the page that has 003 at the
17   bottom, and at the bottom of the page, there's a
18   heading called Technology?
19 A. Um-hm.
20 Q. And it simply says, "So we'll be using Blaze V 7.1
21   with the Java business object model," and my
22   question is: Did you have any -- it says we will
23   be, you know, it's futuristic as you say.
24 A. Yup.
25 Q. Did you have any personal involvement in the

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1   installation of Blaze Advisor 7.1 and the UK data
2   center?
3 A. Not personally.
4 Q. Okay. Thank you. On the disclosure, Exhibit 527,
5   you say -- it says that version 7.1 the
6   approximate date of installation was September 6,
7   2013.
8 A. Um-hm.
9 Q. Do you know is it possible for you to -- let me
10   ask a better question.
11   Why do you tell us the approximate date of
12   the installation as opposed to the actual date of
13   the installation?
14 A. Because all the information that we had talking
15   with everybody it was September 6, or 7, or 8, one
16   of those dates, when it was deployed on the
17   server. If you're referring to these, they are
18   just talking about how will we do, how will we --
19   thinking how will we assess futuristic.
20 Q. Um-hm. Then on this Exhibit 537, there is a for
21   Europe version 8.1, and the approximate date of
22   installation being May 9, 2017.
23 A. Yup.
24 Q. Do you have any personal knowledge of that?
25 A. Yup.

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1 Q. What is that?
2 A. So we -- we have a amortization period of servers
3   every four years.
4 Q. You have what?
5 A. Amortization.
6 Q. Okay. Oh. Amortize?
7 A. Yeah. Servers -- all server replace with new
8   server. Like your cellphone, you replace every
9   few years. Server gets replaced every four years.
10   So that's why you see the date that had to be here
11   (indicating), 9 plus 4 plus 13 plus 17. It's just
12   deployed. It's not like new. It's deployed.
13   Because you are changing the servers.
14 Q. Blaze Advisor software was installed on different
15   servers --
16 A. Also.
17 Q. New servers in the UK?
18 A. Yeah. Old server get rid of. New server.
19 Q. Okay. Let's move to Australia.
20 A. Okay.
21 Q. One of the applications, or an application which
22   have used in Australia is called Adapt; correct?
23 A. Um-hm.
24 Q. And there's also an application used in the UK
25   called Adapt; correct?

12 (Pages 42 - 45)

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1 A. Um-hm.
2 Q. I'll tell you my understanding, and you can
3   correct me if I'm wrong, but my understanding from
4   your earlier testimony is that the Blaze Advisor
5   used in the Australian applications is hosted in
6   the UK data center; is that correct?
7 A. Yes.
8   MS. JANUS: Object to the form of the
9   question.
10   BY MR. HINDERAKER:
11 Q. That is correct?
12 A. Yes.
13 Q. And has it always been the case that the Blaze
14   Advisor used in the applications for Australia was
15   hosted in the UK?
16   MS. JANUS: Object to the form of the
17   question. If -- is the question relating to
18   installation?
19   MR. HINDERAKER: Sure. It has to -- the
20   software --
21   MS. JANUS: You're asking about whether
22   Blaze Advisor has been installed in Australia?
23   That's a fair question to ask pursuant to the
24   topics that you've noticed here. So that -- to
25   the extent you're --

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1   BY MR. HINDERAKER:
2 Q. Exhibit 527 says Blaze Advisor was not installed
3   in Australia.
4 A. That's correct.
5 Q. Is that accurate?
6 A. That's correct.
7 Q. And applications using Blaze Advisor for Australia
8   were installed and Blaze Advisor was installed and
9   therefore hosted on the UK servers?
10   MS. JANUS: Object to the form of the
11   question.
12   BY MR. HINDERAKER:
13 Q. Correct?
14 A. So your question is -- say it again.
15 Q. Sure. Blaze Advisor -- Blaze Advisor was
16   installed on servers in the UK?
17 A. Yes sir.
18 Q. And Blaze Advisor was used for applications -- for
19   Australian applications from the UK?
20 A. Used by Australia but deployed only in UK.
21 Q. Correct, and it was deployed in the UK because it
22   was installed on servers in the UK?
23 A. Yes.
24   MS. JANUS: I'm just going to object to the
25   form of the question as being outside the scope of

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1   the 30(b)(6) topics. This witness is prepared to
2   answer questions about the installation or lack
3   thereof of Blaze in Canada, Australia, and Europe.
4   BY MR. HINDERAKER:
5 Q. The earliest installation that is on Exhibit 527
6   for Europe is November 6, 2009 as we can see.
7 A. Yup.
8 Q. All right. I'll represent to you, but if you want
9   the exhibit I can pull that out, but let me
10   represent to you that an Australian application
11   called Adapt -- or let me rephrase that.
12   An application called Adapt that was used
13   in connection with the sale of insurance in
14   Australia was connected to written premiums
15   selling insurance as early as 2007.
16   MS. JANUS: Object to the form of the
17   question. Object to the extent it purports to
18   state evidence in the record. Object that this
19   line of questioning is outside the scope of the
20   30(b)(6) deposition.
21   (Whereupon material was marked for
22   identification as Exhibit 533.)
23   BY MR. HINDERAKER:
24 Q. I know you're just looking at it now. Have you
25   seen Exhibit 533 before?

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1 A. Let me look at it.
2 Q. Sure.
3 A. Okay. So what's the question?
4 Q. Okay. I guess my question was: Have you seen it
5   before, that Exhibit 533?
6 A. I don't recall it.
7 Q. Okay. Thank you. Would you turn to the third
8   page.
9 A. Um-hm.
10 Q. You'll see the subject matter from the bullet
11   above the columns is Adapt.
12 A. Um-hm.
13 Q. And if you go to the year on the bottom of the
14   table, it says 2007.
15 A. Um-hm.
16 Q. And you see it reports a certain amount of gross
17   written premium, a policy count for Chubb
18   Insurance Company of Australia.
19 A. Um-hm.
20 Q. Where was Blaze Advisor installed that was used
21   for Adapt on behalf of Chubb Insurance Company of
22   Europe in 2007?
23   MS. JANUS: Object to the form of the
24   question.
25   THE WITNESS: The question again?

13 (Pages 46 - 49)

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1   MR. HINDERAKER: Could you read my question
2   back please.
3   (Whereupon the material was read by the
4   shorthand reporter.)
5   MR. HINDERAKER: Chubb Insurance Company of
6   Australia.
7   MS. JANUS: You said Europe.
8   MR. HINDERAKER: Then I misspoke. I should
9   make a better question.
10   BY MR. HINDERAKER:
11 Q.   Where was Blaze Advisor installed used on the
12   Adapt application on behalf of Chubb Insurance
13   Company of Australia in 2007?
14   MS. JANUS: Object to the form of the
15   question.
16   THE WITNESS: Do you want me to guess?
17   BY MR. HINDERAKER:
18 Q.   I'd rather you not guess. You can know or don't
19   know.
20 A.   I don't know what I know. It was installed in
21   2009 in UK. Before that, it would have been
22   installed in Raleigh, but that would be this --
23   that's the only way; installed in Raleigh, and
24   2009 deployed in UK.
25 Q.   Do you know that from talking with anybody?

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1 A.   Not hundred percent sure.
2 Q.   Do you know that from talking with anybody? Did
3   you speak with anybody about that subject?
4 A.   No. I ask European people when were the first
5   time installed, and first time it was installed in
6   UK in 2009.
7 Q.   Thank you. Did you ask anybody where Blaze
8   Advisor was installed for the Adapt application
9   for Chubb Insurance Company of Australia in 2007?
10 A.   Not specific to Australia itself, but I asked
11   before 2009 where was it installed, and also it
12   was installed only in Raleigh, North Carolina, not
13   -- nowhere else. 2009 was the first time it was
14   installed in the UK.
15 Q.   Who told you that about it being installed in
16   Raleigh in 2007?
17 A.   All my team members.
18 Q.   Name the names please.
19 A.   Henry, and Shailesh, and everybody.
20 Q.   Henry?
21 A.   Yes.
22 Q.   Mirolyuz?
23 A.   Yup.
24 Q.   Did you speak with Henry Mirolyuz in preparing for
25   the deposition today?

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1 A.   Not for this one, but previously, I asked this
2   question where was it installed -- when was the
3   first time it was installed outside of the US, and
4   the answer was 2009.
5   (Whereupon material was marked for
6   identification as Exhibit 534.)
7   BY MR. HINDERAKER:
8 Q.   Let me know when you've had a chance to look at
9   the document.
10 A.   Okay.
11 Q.   Do you agree that you were not personally involved
12   in these communications?
13 A.   No.
14 Q.   Agreed?
15 A.   Yeah.
16 Q.   Hamish Tonkin is -- has responsibilities for Chubb
17   Insurance Company of Europe; agreed?
18 A.   Yes. He was architect.
19 Q.   And Russell Hodey, his responsibilities were Chubb
20   Insurance Company of Australia?
21 A.   European Chubb.
22 Q.   I'm sorry?
23 A.   European Chubb, EUD.
24 Q.   European -- I don't understand what that means?
25 A.   Yes. Australia. I see it now.

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1 Q.   Okay. So Hodey is a Chubb Insurance Company of
2   Australia?
3 A.   Hodey to my knowledge was the Europe Chubb manager
4   EUD.
5 Q.   Okay.
6 A.   There were no Australian in Chubb. It was EUD
7   that was from Europe.
8 Q.   So Russell Hodey, for example, would be physically
9   housed or officing in London?
10 A.   No. He could be anywhere.
11 Q.   Did you know -- do you know where he was housed?
12 A.   No. I don't know where he was, but I knew he was
13   part of EUD.
14 Q.   Okay. Did you review this document in preparing
15   for the deposition today?
16 A.   No.
17 Q.   And let me -- let me direct your attention to the
18   second page, and then in the middle of the second
19   page, you see the greeting Jackie?
20 A.   (Indicating.)
21 Q.   Yeah. Exactly.
22 A.   Okay.
23 Q.   And if you look at the last sentence of that first
24   paragraph, it says, "However, working assumption
25   for AUS, "and do you see where I'm reading? Can I

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1 see your document to see if we're on the same
2 page? Yeah. Right here where it starts however.
3 A. Okay.
4 Q. Says, "However, working assumption for AUS," and
5   do you interpret that as Australia?
6 A. Let me read it. Okay. Working assumption. Okay.
7 Q. Do you -- do you understand AUS to be an
8   abbreviation for Australia?
9 A. Yes. I guess so.
10 Q. Then the next word is EVO. Do you understand that
11   as a abbreviation for Evolution?
12 A. Yup.
13 Q. Okay. "Go live is hosted in Singapore and I guess
14   in ACE DC."
15 A. Okay.
16 Q. And did Legacy Chubb have a data center in
17   Singapore?
18 A. No.
19 Q. Did Legacy ACE have a data center in Singapore?
20 A. Not sure. I don't know.
21 Q. Okay. So can you give me any -- what is your --
22   so the document says, "Go live is hosted in
23   Singapore." Can you give me any further
24   information on that?
25 A. It would be guessing. Evolution go live, hosted

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1 go live in the host, no, doesn't make sense. I
2 know it --
3 Q. I can't hear you.
4 A. I would be wrong actually to interpret this.
5 Q. Okay. Then don't. We'll leave it as it is.
6   MR. HINDERAKER: Mr. Pandey, thank you for
7 your time. I don't have any further questions.
8   MS. JANUS: We'll read and sign.
9   THE VIDEOGRAPHER: This concludes today's
10 deposition. Time now is 11:09 a.m.
11   (Whereupon the deposition adjourned at
12   11:10 a.m.)
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1 STATE OF MINNESOTA)
2 COUNTY OF HENNEPIN)
3   I Jacqueline McKone, certified shorthand
4 reporter and notary public for the State of
5 Minnesota, certify there came before me the
6 deponent herein who was sworn by me to testify to
7 the truth concerning the matters in this cause,
8 and I certify this transcript is a true transcript
9 of my original shorthand notes.
10   I certify I am neither attorney nor counsel
11 for, nor related to, nor employed by any of the
12 parties to the action in which this deposition is
13 taken; and furthermore, I am not a relative or
14 employee of any attorney or counsel employed by
15 the parties hereto, or financially interested in
16 this action.
17   The cost of the original transcript has been
18 charged to the party noticing the deposition, and
19 all parties ordering copies are charged at the
20 same rate for such copies.
21   IN WITNESS WHEREOF, I have affixed my notary
22 seal this day: 2 December 2019
23
24 *Jacqueline McKone*
25   Jacqueline McKone

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```
1           DEPOSITION REVIEW
              CERTIFICATION OF WITNESS
2
        ASSIGNMENT REFERENCE NO: 3787487
3       CASE NAME: Fair Isaac Corporation v. Federal Insurance
   Company, Et Al.
        DATE OF DEPOSITION: 11/26/2019
4       WITNESS' NAME: Ramesh Pandey , 30(b)(6)
5       In accordance with the Rules of Civil
   Procedure, I have read the entire transcript of
6  my testimony or it has been read to me.
7       I have made no changes to the testimony
   as transcribed by the court reporter.
8
       _____      _____
9  Date             Ramesh Pandey , 30(b)(6)
10      Sworn to and subscribed before me, a
   Notary Public in and for the State and County,
11  the referenced witness did personally appear
   and acknowledge that:
12
        They have read the transcript;
13      They signed the foregoing Sworn
            Statement; and
14      Their execution of this Statement is of
            their free act and deed.
15
        I have affixed my name and official seal
16
   this _____ day of_____, 20____.
17
       _____
18      Notary Public
19     _____
        Commission Expiration Date
20
21
22
23
24
25
```

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```
1           DEPOSITION REVIEW
              CERTIFICATION OF WITNESS
2
        ASSIGNMENT REFERENCE NO: 3787487
3       CASE NAME: Fair Isaac Corporation v. Federal Insurance
   Company, Et Al.
        DATE OF DEPOSITION: 11/26/2019
4       WITNESS' NAME: Ramesh Pandey , 30(b)(6)
5       In accordance with the Rules of Civil
   Procedure, I have read the entire transcript of
6  my testimony or it has been read to me.
7       I have listed my changes on the attached
   Errata Sheet, listing page and line numbers as
8  well as the reason(s) for the change(s).
9       I request that these changes be entered
   as part of the record of my testimony.
10
        I have executed the Errata Sheet, as well
11  as this Certificate, and request and authorize
   that both be appended to the transcript of my
12  testimony and be incorporated therein.
13     _____      _____
        Date             Ramesh Pandey , 30(b)(6)
14
        Sworn to and subscribed before me, a
15  Notary Public in and for the State and County,
   the referenced witness did personally appear
16  and acknowledge that:
17      They have read the transcript;
        They have listed all of their corrections
18          in the appended Errata Sheet;
        They signed the foregoing Sworn
19          Statement; and
        Their execution of this Statement is of
20          their free act and deed.
21      I have affixed my name and official seal
22  this _____ day of_____, 20____.
23     _____
        Notary Public
24     _____
25      Commission Expiration Date
```

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        VERITEXT LEGAL SOLUTIONS MIDWEST
2       ASSIGNMENT NO: 11/26/2019
3  PAGE/LINE(S) /      CHANGE      /REASON
4  _____
5  _____
6  _____
7  _____
8  _____
9  _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18 _____
19
       _____      _____
20  Date             Ramesh Pandey , 30(b)(6)
21  SUBSCRIBED AND SWORN TO BEFORE ME THIS _____
22  DAY OF _____, 20_____ .
23     _____
        Notary Public
24
       _____
25      Commission Expiration Date
```

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Minnesota Rules of Civil Procedure

Part V. Depositions and Discovery

Rule 30

Rule 30.05 Review by Witness; Changes; Signing

If requested by the deponent or a party before

completion of the deposition, the deponent shall

have 30 days after being notified by the officer

that the transcript or recording is available in

which to review the transcript or recording and, if

there are changes in form or substance, to sign a

statement reciting such changes and the reasons

given by the deponent for making them. The officer

shall indicate in the certificate prescribed by

Rule 30.06(1) whether any review was requested and,

if so, shall append any changes made by the

deponent during the period allowed.

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ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1,

2019. PLEASE REFER TO THE APPLICABLE STATE RULES

OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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